## Federal Defenders OF NEW YORK, INC.

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Leonard F. Joy Executive Director

## MEMO ENDORSED

Southern District of New York John J. Byrnes Attorney-in-Charge

## By Hand Delivery

The Honorable Richard M. Berman United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: <u>United States v. Juan Ortiz</u> 07 Cr. 1218

Dear Judge Berman:

June 6, 2008

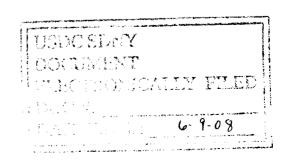


I write to request a brief adjournment of the status conference concerning Juan Ortiz, currently scheduled for June 10, 2008 at 9:30 a.m. I have spoken to Assistant United States Attorney Natalie Lamarque, who consents to this request.

I make this request because there has been a change in counsel. I am taking over the case from Mr. Hugh Mundy, who has left our office, and would like time to meet with Mr. Ortiz and familiarize myself with his file. In addition, as I discussed with Ms. Lamarque, I am hopeful that after meeting with Mr. Ortiz we will enter into plea discussions with the government.

After a conversation with Ms. Murray, Mr. Ortiz's conference was tentatively re-scheduled for June 16, 2008 at 4:00 p.m., pending the approval of this request. Ms. Lamarque has informed me, however, that she will be away between June 16 and June 26, 2008. Accordingly, I request that Mr. Ortiz's status conference be adjourned until after June 26, 2008.

Mr. Ortiz consents to the exclusion of time under the Speedy Trial Act.



The Honorable Richard M. Berman June 6, 2008

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Thank you for your consideration of this request.

Respectfully submitted,

Martin S. Cohen Attorney for Juan Ortiz 212-417-8737

ce: Natalie Lamarque, AUSA via facsimile 212-637-2527

Conference is adjourned to
7-8-08 at 3:00 p.m. Time is
excluded pursuant to the
speedy Trial Act for the
reasons set forth in this letter.

SO ORDERED:
Date: 6-9-08
Richard M. Berman
Richard M. Berman
Richard M. Berman